

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case no. 1:23CV00878-TDS-JEP

DEMOCRACY NORTH CAROLINA; NORTH)
CAROLINA BLACK ALLIANCE; LEAGUE)
OF WOMEN VOTERS OF NORTH)
CAROLINA,)

Plaintiffs,)

vs.)

ALAN HIRSCH, in his official)
capacity as CHAIR OF THE STATE)
BOARD OF ELECTIONS; JEFF CARMON)
III, in his official capacity)
as SECRETARY OF THE STATE BOARD)
OF ELECTIONS; STACY EGGERS IV,)
in his official capacity as)
MEMBER OF THE STATE BOARD OF)
ELECTIONS; KEVIN LEWIS, in his)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
SIOBHAN O'DUFFY MILLEN, in her)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
KAREN BRINSON BELL, in her)
official capacity as EXECUTIVE)
DIRECTOR OF THE STATE BOARD OF)
ELECTIONS; NORTH CAROLINA STATE)
BOARD OF ELECTIONS,)

Defendants.)

30(b)(6) DEPOSITION OF THE
STATE BOARD OF ELECTIONS by
PARKER HOLLAND

NELSON MULLINS RILEY & SCARBOROUGH
301 HILLSBOROUGH STREET
RALEIGH, NC 27603

10:05 A.M.
TUESDAY, FEBRUARY 25, 2025

By: Denise Myers Byrd, CSR 8340, RPR

1 large spreadsheet that I do not believe has been
2 marked as an exhibit.

3 ATTORNEY RIGGINS: So I'll transmit
4 this to you, Madam Court Reporter, but it is
5 NCSBE_003098-2025-02-06litigationticket_124972_
6 SDRundeliverable_verification_history_2024.

7 (WHEREUPON, Exhibit 41 was marked for
8 identification.)

9 ATTORNEY STEED: I did that just to
10 mess with everybody.

11 What was the Bates number?

12 ATTORNEY RIGGINS: 003098.

13 And can you put that up on the screen.
14 That is the title of the document that I stated.
15 I just wanted to be clear.

16 We're going to expand the column header
17 so you can see everything.

18 BY ATTORNEY RIGGINS:

19 Q. Have you ever seen this document before,
20 Mr. Holland?

21 A. I believe I looked at it as part of preparation
22 for the deposition.

23 Q. Okay. Can you tell me what your understanding
24 is of this document.

25 A. My understanding is it's the same-day

1 registrants from the 2024 elections and the
2 different statuses and their -- where they went,
3 or how they went, rather, during that election
4 period.

5 Q. Okay. And so column A is the voter's voter
6 registration number; is that right?

7 A. Correct.

8 Q. And then the county, that's the county code 1
9 through 100?

10 A. Yes.

11 Q. And then we've got a transaction ID, is that
12 right, in column C?

13 A. Yes, ma'am.

14 Q. And what do those numbers represent, if you
15 know?

16 A. It appears they represent the -- literally the
17 number of transactions that occurred for that
18 particular voter. As you can see 1 through
19 6 -- oh, excuse me. It appears 1 through 9,
20 actually, or -- well, yes, 1 through 9 --

21 Q. Are all the same voter registration?

22 A. Yes.

23 Q. I see. I did not catch on to that before. All
24 right. That's significantly more helpful than I
25 thought.

1 And then the transition reason, that's
2 column D; is that right?

3 A. Yes, ma'am.

4 Q. And at the risk of pulling out Exhibit 4 again,
5 are the transition reason codes listed on
6 page 10 of Exhibit 4? I was so sure I was done
7 with that exhibit.

8 A. It appears that --

9 ATTORNEY STEED: Next page.

10 THE WITNESS: Thank you. Really
11 appreciate that.

12 Yes.

13 BY ATTORNEY RIGGINS:

14 Q. All right. And then what is -- do you know what
15 the mail date is here in column E?

16 A. It should be the date where an item was mailed
17 and the status would have been updated if it
18 were a voter -- if it was a verification card.

19 Q. And then the current state, would that
20 correspond to page 9 on Exhibit 4?

21 A. Yes.

22 Q. Perfect. What is batch ID in column H?

23 A. The batch ID is an identification number that is
24 assigned to the number of voter registration
25 forms, voter registration cards, what have you,

1 that are in a group of scanned data.

2 For instance, when I'm doing or a
3 county board staff member is doing voter
4 registration forms and they're processing those
5 in VoterScan, you would group the like version
6 forms in the source codes which indicate how the
7 form was delivered or what type of form it is.
8 You would put all those together, scan them in
9 at one time, and you would receive a batch ID
10 number on a cover sheet.

11 And so that tells the county board
12 where the original document -- or the original
13 voter registration document would be and what
14 batch ID, so it's an identification number of
15 how the forms are scanned in.

16 Q. So is it kind of like the location of the backup
17 data in -- like used to create this? If you
18 wanted to see the actual cards --

19 A. If I wanted -- if I wanted to see the physical
20 form and the retention period had not passed, I
21 would locate the batch ID and however it was
22 filed at the county board, yes.

23 Q. Column -- I think mailed address is probably the
24 address the card was mailed to. Am I right on
25 that?

1 A. Yes, ma'am.

2 Q. Okay. I hate to assume, but, you know.

3 What is N, operator ID, column N,
4 operator ID?

5 A. I believe that's the operator ID that's
6 associated with the person who did the mailing.

7 Q. Oh, so the county board?

8 A. It could be a county staff member. It could
9 also -- it shouldn't be the precinct worker who
10 did the SDR, but I'd have to look to be certain.
11 So I would just like to say that it's one or the
12 other, but I'm almost certain it's the county
13 staff member.

14 Q. But, say, if you were looking to do a simple
15 analysis on who did and did not fail mail
16 verification, the operator ID would not be
17 relevant?

18 A. Not to me personally. If I'm a county staff
19 member wanting to see if there's a county
20 directory and I'm looking to see if there's a
21 correlation with good data entry and bad data
22 entry, I may do that, but for an analysis for
23 our purposes for address verification, I would
24 go -- and who it was, I would go to the voter
25 registration number.

1 Q. County board staff are safe for me at least. I
2 don't need that.

3 What is column O? I'm guessing that
4 would be update date. Am I right on that?

5 A. That's what it appears to be, yes.

6 Q. And it's entered as -- I'm trying to figure out
7 what kind of date this would be. Is Excel
8 just --

9 Right click. It's a format issue.
10 It's -- go to military time, AM, PM format cell.
11 Delete. There you go. It might have an AM, PM
12 option. There it goes. Mine showed up with an
13 AM, PM. Okay.

14 Then what would be under column P, row
15 guid?

16 A. I'm not sure what that is, to be frank.

17 Q. Perfect. We agree on that.

18 Okay. Does this show the full history
19 of the changes through the SDR and cure process,
20 so the backup data, if you will, for the 3097,
21 Exhibit 6 spreadsheet that we looked at earlier?

22 A. Can you repeat the question, please.

23 Q. Sure. So is this -- does this show the full SDR
24 and mail verification process, like each step?

25 A. Oh.

1 Q. So like the full backup for the finished product
2 for 003097 which is Exhibit 6.

3 A. It would appear to, yes.

4 Q. So Exhibit 6 kind of tells you what ultimately
5 happened, and this will show you the
6 full -- it's the math teacher telling you you
7 have to show your work; is that right?

8 A. Yes. It's each step in the process, exactly.

9 Q. So I want to ask a quick question based on -- I
10 want to verify my understanding of how this
11 would work by looking at what I think should be,
12 assuming we have sorted right, running through
13 rows 1,965 through 1,971 in this spreadsheet.
14 And this should be for voter registration number
15 30490041.

16 A. You said 65 through 71. Yes, ma'am.

17 Q. And all of that is -- Cassie, can we highlight
18 that.

19 That's all for the same voter
20 registration number; is that right?

21 A. Yes.

22 Q. And so it looks like here you have the status
23 code 1 first verification new voter pending at
24 the -- at a Duke Campus Box 95672 at line 1,965.
25 Do you see that?